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AUG 10 1993

August 10, 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20036

RE: In the Matter of 1993 Annual Access Tariff Filings; NECA Universal Service Fund and Lifeline Assistance Rates; GSF Order Compliance Filings; BOC Tariff for the 800 Service Management System and 800 Data Base Access Tariff, CC Docket No. 93-193

Dear Mr. Caton:

Attached is the Reply Comments of United and Central Telephone Companies to the Direct Cases of Other Parties in the matter referenced above.

Sincerely,

A handwritten signature in cursive script that reads "Jay C. Keithley".

Jay C. Keithley  
Vice President  
Law and External Affairs

Attachment

JCK/mlm

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington D.C. 20554

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AUG 10 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

1993 Annual Access )  
 Tariff Filings )National Exchange Carrier )  
 Association Universal Service )  
 Fund and Lifeline Assistance )  
 Rates )

GSF Order Compliance Filings )

Bell Operating Companies' )  
 Tariff for the 800 Service )  
 Management System and 800 )  
 Data Base Access Tariff )CC Docket No. 93-193

**REPLY COMMENTS OF UNITED AND CENTRAL TELEPHONE COMPANIES  
 TO THE DIRECT CASES OF OTHER PARTIES**

The United and Central Telephone companies ("United and Central") hereby provide their reply comments to the direct cases filed by other parties pursuant to the Commission's 1993 Access Charge Suspension Order.<sup>1</sup> Several parties filed direct cases that were in opposition to the method United used to assign LIDB Transport and LIDB Query to the Switching element.<sup>2</sup> United

1. Memorandum Opinion and Order Suspending Rates Issues for Investigation "Suspension Order" DA 93-762 in CC Dockets No. 93-193, 93-123, 93-129 and NECA Transmittal No. 556, released June 23, 1993.

2. See Ameritech Response at 4-5, Bell Atlantic Direct Case at 14 BellSouth Direct Case at 10-11, GTE Case at 31-32, NYNEX Direct Case at 4-5, Southwestern Bell Direct Case at 53-54, and US West Direct Case at 14.

continues to believe that it has correctly assigned the LIDB Transport and LIDB Query charges to the Switching element.

Ameritech states that because "LIDB does include a charge for transport service, the LIDB per query charges should be placed in the local transport service category...."<sup>3</sup> US West claims that Transport is the correct assignment because CCS Networks are used for transport functions and, as a result, LIDB should be assigned to transport.<sup>4</sup> Southwestern quotes from the Southwestern Waiver Order<sup>5</sup> where the Commission deals with "the link between an IXC SPOI and a LEC STP that Southwestern Bell calls STP Access Mileage" where "the costs of STP Access Mileage are properly recovered as a new dedicated transport subelement in the Transport element." Southwestern notes that the same decision was made for the STP Port Termination Subelement. Southwestern comes to the conclusion that "since LIDB Validation Service is dependent on network interconnection" and since "network interconnection costs are to be included in the Transport element" that "LIDB costs should also be in the Transport element."<sup>6</sup> All of these arguments ignore the fact that LIDB STP and SCP functions are primarily switching related.

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3. Ameritech at 4-5.

4. US West at 14.

5. Southwestern Bell Telephone Company Petitions for Waiver of Part 69 of the Commission's Rules, Memorandum Opinion and Order ("Southwestern Waiver Order") DA 91-1258, released October 4, 1991.

6. Southwestern at 54.

The Commission dealt directly with the assignment of IXC SPOI to LEC STP cost and the cost of the STP Port in the Southwestern Waiver Order. United and Central agree that these costs are to be assigned to the Transport element. However, no direction was given concerning the assignment of STP usage and STP-to-SCP movement of queries or the SCP query itself.

United and Central explained in their direct case<sup>7</sup> that STP usage and STP-to-SCP movement of queries consists largely of the STP-related switching costs. Further, SCP decisions on whether to continue the switching function are also switching related. Because these costs are switching related, they should be assigned to the Switching element.

Claims that CCS network connection of LIDB somehow control the assignment of switching functions to Transport should be dismissed. The LIDB of some service providers may be reached by CCS interconnection or by X.25 links. Thus, CCS is not the only method of interconnection and should not control the assignment of a LIDB switching function to Transport. Further, just because the majority of the LIDB providers chose to treat LIDB Transport and LIDB Query to the Transport element differently should not invalidate the United assignment of these subelements to Switching.

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7. United at 4-6.

United has complied with all Commission orders dealing with assignment of LIBD Transport and LIDB Query subelements. Because these subelements are primarily switching related, they should be assigned to the Switching element rather than misassigned to the Transport element.

Respectfully Submitted

UNITED/CENTRAL TELEPHONE COMPANIES

By

  
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THEIR ATTORNEYS

August 10, 1993

### **CERTIFICATE OF SERVICE**

I, Melinda L. Mills, hereby certify that I have on this 10th day of August, 1993, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of the United and Central Telephone Companies to the Direct Cases of Other Parties" in the Matter of 1993 Annual Access Tariff Filings; NECA Universal Service Fund and Lifeline Assistance Rates; GSF Order Compliance Filings; BOC Tariff for the 800 Service Management System and 800 Data Base Access Tariff, CC Docket No. 93-193, filed this date with the Acting Secretary, Federal Communications Commission, to the persons listed on the attached service list.

  
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